

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

21 MC 102

KRZYSZTOF PAJAK AND EWA PAJAK,

07cv04502

Plaintiffs,

- against -

90 CHURCH STREET LIMITED PARTNERSHIP,
ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., AMERICAN EXPRESS BANK,
LTD, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC., ANN TAYLOR
STORES CORPORATION, BATTERY PARK
CITY AUTHORITY, BELFOR USA GROUP,
INC., BFP ONE LIBERTY PLAZA CO., LLC,,
BFP TOWER C CO. LLC, BFP TOWER C MM
LLC, BLACKMON-MOORING-STEAMATIC
CATASTOPHE, INC. D/B/A BMS CAT, BOSTON
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, INC, BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS,
LP, BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS INC, ENVIROTECH CLEAN AIR,
INC, GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC,
HILLMAN ENVIRONMENTAL GROUP, LLC,
INDOOR ENVIRONMENTAL TECHNOLOGY,
INC, KASCO RESTORATION SERVICES CO.,
LEHMAN BROTHERS HOLDINGS INC,
LEHMAN BROTHERS, INC, LEHMAN
COMMERCIAL PAPER, INC, MERRILL
LYNCH & CO, INC, NATIONAL
ASSOCIATION OF SECURITIES DEALERS,
INC, NEW LIBERTY PLAZA LP, NEW YORK
CITY INDUSTRIAL DEVELOPMENT AGENCY,
NEW YORK CITY INDUSTRIAL
DEVELOPMENT CORPORATION, NOMURA
HOLDING AMERICA, INC, NOMURA
SECURITIES INTERNATIONAL, INC, ONE
LIBERTY PLAZA, STRUCTURE TONE (UK),
INC, STRUCTURE TONE GLOBAL SERVICES,
INC, THE BOARD OF MANAGERS OF THE
ONE LIBERTY PLAZA CONDOMINIUM
(CONDO #1178), THE ONE LIBERTY PLAZA

CONDOMINIUM (CONDO #1178), TOSCORP INC, TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC., TUCKER ANTHONY, INC, WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., WFP TOWER D. CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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**ENVIROTECH CLEAN AIR'S ANSWER TO AMENDED
COMPLAINT BY ADOPTION**

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Amended Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
June 2, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY:



Heather L. Smar (4622)